



March 24, 2006

National Organics Standards Board  
c/o Valerie Frances  
Room 4008 – South Building  
1400 and Independence Avenue, SW  
Washington, DC 20230-0001

*Re: Final Report by the Aquaculture Working Group of the NOSB*

Dear Ms. Frances,

As a member of the molluscan shellfish farming community, and someone who has been involved from the onset on potential organic standards for shellfish, I want to voice my strong disappointment that this report, as previous reports, failed entirely to address molluscan shellfish issues.

Over the past five years, there have been several efforts towards development of organic standards for aquaculture species, including, theoretically, molluscan shellfish. The various committees and task forces appointed by the National Organics Standards Board over the years has always consisted of several finfish experts but only one mollusc representative. As a result, the discussions have centered around issues such as feed and other topics that have little or no relevance to the raising of molluscs, while issues specific to molluscs have not been seriously considered. This is evident, again, from the most recent report.

In the meantime, organic standards for shellfish have been developed in other countries, and these shellfish are now being marketed as organic in the U.S. This puts our domestic growers at a significant disadvantage. Given the significant ongoing seafood trade deficit in our country, this situation has become intolerable.

In the interest of furthering the development of standards that will be applicable to molluscan shellfish in a timely fashion, we are requesting that the National Organic Standards Board, or the USDA itself, appoint a Molluscan Shellfish Organic Standards Development Task Force. This Task Force should be made up of shellfish experts from academia, shellfish industry members, and organic standards experts, for the purpose of developing a set of organic certification standards specific to molluscan shellfish that will

comply with the National Organics Program standards and allow our domestic producers to compete in this growing niche market.

Thank you for your serious consideration of this request.

Sincerely,

Robin Downey  
Executive Director

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